

**Evans, Sandra E**

---

**From:** DJenni7474@aol.com  
**Sent:** Thursday, August 21, 2003 2:05 PM  
**To:** regs.comments@ots.treas.gov  
**Subject:** ATTL No. 03-35

Dear Sir or Madam:

We appreciate the opportunity to comment on the Interagency Guidance on Response Programs for Unauthorized Access to Customer Information and Customer Notice. There are a variety of issues that would make this regulation very burdensome for financial institutions.

We would encourage the regulators to adopt a few specific instances for which notice would be required rather than the broad, open-ended proposal. We appreciate the specific examples given and perhaps that would be appropriate for constructing the guidelines in a more specific manner. It is not difficult to conjure dozens of otherwise innocuous events that could be construed as reportable breaches.

We would also encourage changing the definition of sensitive information to eliminate the inclusion of an account number coupled with an identifier (such as a name). This requirement would make the unauthorized viewing of any consumer check a reportable incident. We believe this would be an unnecessary and unfair burden on financial institutions because checks are freely passed among merchants and individuals, given potential access to many people who are not under these notification requirements.

Again, we appreciate the opportunity to comment.

Don Jennings  
Executive Vice President  
First Federal Savings Bank of Frankfort, KY  
(502) 223-1638

08/27/2003